

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

2018 AUG 17 A 11:37

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA,

vs.

PAUL J. MANAFORT, JR.,

Defendant.

Criminal Action No.: 1:18-cr-83

**CBS BROADCASTING INC. MOTION TO INTERVENE
AND JOIN MOTION FOR ACCESS TO CERTAIN PORTIONS OF THE RECORD**

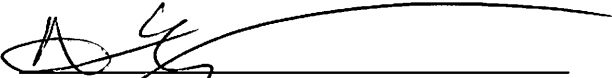
By and through undersigned counsel, CBS Broadcasting Inc. (“CBS”) respectfully moves this Court for leave to intervene in this matter for the limited purpose of joining prospective intervenors Cable News Network, Inc. (“CNN”); The Associated Press (“AP”); BuzzFeed, Inc. (“BuzzFeed”); NBCUniversal Media, LLC (“NBC”); The New York Times Company (“The Times”); POLITICO LLC (“Politico”); and WP Co., LLC, d/b/a/ The Washington Post (the “Post”) (collectively, the “Media Coalition”) in the Media Coalition Motion to Intervene and For Access to Certain Portions of the Record (the “Media Coalition Motion”). CBS wishes to join the Media Coalition because it shares the other Coalition members’ interests in obtaining access to the public information sought in the Media Coalition Motion. None of the other members of the Media Coalition objects to CBS’s intervention and joining the Media Coalition Motion.

WHEREFORE, CBS Broadcasting Inc. respectfully requests that the Court enter an order granting it leave to intervene and join the Media Coalition Motion to Intervene and For Access to Certain Portions of the Record as a member of the Media Coalition.

Respectfully submitted,

Dated: August 17, 2018

BALLARD SPAHR LLP

By: 

Jay Ward Brown (Va. Bar No. 34355)

brownjay@ballardspahr.com

Matthew E. Kelley (Va. Bar No. 84045)

kelleym@ballardspahr.com

BALLARD SPAHR LLP

1909 K Street, NW

Washington, D.C. 20006-1157

T: (202) 508-1136

F: (202) 661-2299

*Counsel for Cable News Network, Inc.; The
Associated Press; BuzzFeed, Inc.; CBS
Broadcasting Inc.; NBCUniversal Media,
LLC; The New York Times Company;
POLITICO LLC; and WP Co., LLC, d/b/a/ The
Washington Post*

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of August, 2018, I caused true and correct copies of the foregoing Motion to Intervene and Join Motion For Access to Certain Portions of the Record, along with true and correct copies of the Memorandum in support thereof, the proposed order, and the Corporate Disclosure Statements, to be served via electronic mail and U.S. Mail on the following counsel of record:

Andrew A. Weissmann
Adam C. Jed
Brandon Lang Van Grack
Greg D. Andres
Michael R. Dreeben
Scott Andrew Meisler
Uzo Asonye
U.S. Attorney's Office for the Eastern District of Virginia
2100 Jamieson Avenue
Alexandria, VA 22314
(703) 299-3700
aaw@usdoj.gov
acj@usdoj.gov
bvg@usdoj.gov
GDA@usdoj.gov
mrd@usdoj.gov
sacm@usdoj.gov

Attorneys for the United States of America

Jay Rohit Nanavati
Kostelanetz & Fink LLP
601 New Jersey Avenue NW
Suite 620
Washington, DC 20001
(202) 875-8000
jnanavati@kflaw.com

Thomas E. Zehnle
Law Office of Thomas E. Zehnle
601 New Jersey Avenue NW
Suite 620
Washington, DC 20001

(202) 368-4668
tezehnle@gmail.com

Attorneys for Defendant Paul J. Manafort, Jr.

By:


Matthew E. Kelley